

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Thomas W. Scott, Jr., et. al.,

Plaintiffs,

v.

Select Portfolio Servicing, Inc.

Defendant.

Case No. 16-cv-2859-JG

Hon. James Gwin

**PLAINTIFF'S PRELIMINARY
BUDGET OF ATTORNEYS FEES
AND EXPENSES**

Plaintiffs' counsel's preliminary budget of Attorney's fees and costs for this matter pursuant to the Case Management Order.

Attorney's Fees

Preliminary Investigation & Filing the Complaint	\$4,226.75
Procedural Motion Practice	\$12,500.00
Discovery	\$25,000.00
Dispositive Motions Practice	\$15,000.00
Settlement Negotiations	\$4,000.00
Trial-including preparation	<u>\$50,000.00</u>
TOTAL	\$110,726.75

Costs

Depositions	\$17,500.00
Experts	\$25,000.00
Witness Fees	\$500.00
Other, i.e., copies, postage, overnight, exhibits	<u>\$5,000.00</u>
TOTAL	\$48,000.00

Respectfully submitted,

/s/ Marc E. Dann

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was sent via electronic mail on Monday, January 9, 2017 to the parties listed below:

David Wallace
Carpenter Lipps
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/s/ Marc E. Dann

Marc E. Dann (0039425)

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